

RECEIVED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

U.S. BANK NATIONAL ASSOCIATION,

Plaintiff,

Civil Action No.: 08cv2540(DC)

vs.

ABLES & HALL BUILDERS, a Kentucky
General Partnership; RONNIE ABLES,
DENNIS WADE ABLES and JAMES A.
HALL, its General Partners,

ECF CASE

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

Defendants.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District
Courts for the Southern and Eastern Districts of New York, I, STEPHEN G. TRAFLET
a member in good standing of the bar of this Court, hereby move for an Order allowing
the admission pro hac vice of:

John David Dyche, Esq.
Fultz Maddox Hovious & Dickens PLC
2700 National City Tower
101 South Fifth Street
Louisville, KY 40202-3116
Tel: 502.588.2000 (Main Number)
Tel: 502.588.2017 (Direct Dial)
Fax: 502.588.2020
jddyche@fmhd.com

John David Dyche, Esq. is a member in good standing of the Bar of the State of
Kentucky. John David Dyche, Esq. is also admitted to practice in the following courts:
the United States Supreme Court; the United States Court of Appeals for the Sixth
Circuit; the United States District Court for the Eastern District of Kentucky; and the

FILED
U.S. DISTRICT COURT
2008 MAR 31 AM 9:33
S.D.N.Y.

MAR 31 2008

6446185-5810749-526706

United States District Court for the Western District of Kentucky. There are no pending disciplinary proceedings against John David Dyche, Esq. in any State or Federal court.

Dated: Morristown, New Jersey
March 26, 2008

Respectfully submitted,



Stephen G. Traflet (ST-9654)
TRAFLET & FABIAN
1001 Avenue of the Americas
11th Floor
New York, NY 10018
Tel: 212.244.6199
Fax: 212.859.7313

264 South Street
Morristown, NJ 07960
Tel: 973.631.6222
Fax: 973.631.6226
straflet@trafletfabian.com

Attorneys for Defendants
Ables & Hall Builders, Ronnie Ables,
Dennis Wade Ables and James A. Hall

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

U.S. BANK NATIONAL ASSOCIATION,

Plaintiff,

Civil Action No.: 08cv2540(DC)

vs.

ABLES & HALL BUILDERS, a Kentucky
General Partnership; RONNIE ABLES,
DENNIS WADE ABLES and JAMES A.
HALL, its General Partners,

Defendants.

ECF CASE

**AFFIDAVIT OF
STEPHEN G. TRAFLET
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

STATE OF NEW JERSEY)
) ss.
COUNTY OF MORRIS)

STEPHEN G. TRAFLET, being duly sworn, hereby deposes and says as follows:

1. I am a member of the law firm Traflet & Fabian, counsel for Defendants Ables & Hall Builders, Ronnie Ables, Dennis Wade Ables and James A. Hall in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit John David Dyche, Esq. as counsel pro hac vice to represent Defendants in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in the courts of the State of New York in 1985 by the state Supreme Court, Appellate Division, First Department. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known John David Dyche, Esq. since 2008.

4. Mr. Dyche is Counsel at Fultz Maddox Hovious & Dickens PLC, in Louisville, Kentucky.

5. I have found Mr. Dyche to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of John David Dyche, Esq., pro hac vice.

7. I respectfully submit a proposed order granting the admission of John David Dyche, Esq., pro hac vice, which is attached hereto as **Exhibit A**.

WHEREFORE, it is respectfully requested that the motion to admit John David Dyche, Esq., pro hac vice, to represent Defendants in the above-captioned matter, be granted.

Dated: Morristown, New Jersey
March 26, 2008

Respectfully submitted,



Stephen G. Traflet (ST-9654)
TRAFLET & FABIAN
1001 Avenue of the Americas
11th Floor
New York, NY 10018
Tel: 212.244.6199
Fax: 212.859.7313

264 South Street
Morristown, NJ 07960
Tel: 973.631.6222
Fax: 973.631.6226
straflet@trafletfabian.com

Attorneys for Defendants
Ables & Hall Builders, Ronnie Ables,
Dennis Wade Ables and James A. Hall

KENTUCKY BAR ASSOCIATION

514 WEST MAIN STREET
FRANKFORT, KENTUCKY 40601-1883
(502) 564-3795
FAX (502) 564-3225



OFFICERS

Jane Winkler Dyche
President

Barbara D. Bonar
President-Elect

Charles E. English, Jr.
Vice President

Robert C. Ewald
Past President

YOUNG LAWYERS

Ryan C. Reed
Chair

EXECUTIVE DIRECTOR

James L. Deckard

BOARD OF GOVERNORS

Douglass Farnsley

Fred E. Fugazzi, Jr.

Margo L. Grubbs

James D. Harris, Jr.

Richard W. Hay

R. Scott Madden

Douglas L. McSwain

W. Douglas Myers

Michael J. O'Connell

Thomas L. Rouse

John M. Rosenberg

R. Michael Sullivan

Mark C. Whitlow

William H. Wilhoit

THIS IS TO CERTIFY THAT

JOHN DAVID DYCHE

Fultz, Maddox, Hovious and Dickens
2700 National City Tower
101 South Fifth Street
Louisville, Kentucky 40202-3116

Membership No. 82393

is an active member in good standing with the Kentucky Bar Association as required by the Rules of the Supreme Court of Kentucky. Dated this 5th day of March, 2008.

JAMES L. DECKARD
REGISTRAR



By:

Nicole A. Key

Nicole A. Key, Deputy Registrar

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

U.S. BANK NATIONAL ASSOCIATION,

Plaintiff,

Civil Action No.: 08cv2540(DC)

vs.

ABLES & HALL BUILDERS, a Kentucky
General Partnership; RONNIE ABLES,
DENNIS WADE ABLES and JAMES A.
HALL, its General Partners,

ECF CASE

AFFIRMATION OF SERVICE

Defendants.

I, Stephen G. Traflet, a member of the bar of the United States District Court for the Southern District of New York, under penalty of perjury, hereby affirm:

1. I am not a party to this action and am over the age of eighteen.
2. On the 26th day of March, 2008, I forwarded true and correct copies of the Motion for Admission Pro Hac Vice of John David Dyche, Esq., Affidavit of Stephen G. Traflet in Support of Motion to Admit Counsel Pro Hac Vice (with attached proposed Order for Admission Pro Hac Vice on Written Motion) and Certificate of Good Standing of John David Dyche, Esq. to the following:

Moshe Sasson, Esq.
Sasson Blaivas LLP
488 Madison Avenue, 18th Floor
New York, NY 10022

Jacob E. Miota, Esq.
Michael Best & Friedrich LLP
100 East Wisconsin Avenue, Suite 3300
Milwaukee, WI 53202-4108

by depositing a true copy in a post paid properly addressed wrapper, in an official depository under the exclusive care of the United States Postal Service.



Stephen G. Traflet (ST-9654)
TRAFLET & FABIAN
1001 Avenue of the Americas
11th Floor
New York, NY 10018
Tel: 212.244.6199
Fax: 212.859.7313

264 South Street
Morristown, NJ 07960
Tel: 973.631.6222
Fax: 973.631.6226
straflet@trafletfabian.com

Attorneys for Defendants
Ables & Hall Builders, Ronnie Ables,
Dennis Wade Ables and James A. Hall

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

U.S. BANK NATIONAL ASSOCIATION,

Plaintiff,

Civil Action No.: 08cv2540(DC)

vs.

ABLES & HALL BUILDERS, a Kentucky
General Partnership; RONNIE ABLES,
DENNIS WADE ABLES and JAMES A.
HALL, its General Partners,

ECF CASE

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Defendants.

Upon the motion of Stephen G. Traflet, attorney for Defendants Ables & Hall Builders, Ronnie Ables, Dennis Wade Ables and James A. Hall, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

John David Dyche, Esq.
Fultz Maddox Hovious & Dickens PLC
2700 National City Tower
101 South Fifth Street
Louisville, KY 40202-3116
Tel: 502.588.2000 (Main Number)
Tel: 502.588.2017 (Direct Dial)
Fax: 502.588.2020
jddyche@fmhd.com

is admitted to practice pro hac vice as counsel for Defendants Ables & Hall Builders, Ronnie Ables, Dennis Wade Ables and James A. Hall in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case

Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: _____, 2008
New York, New York

Hon. Denny Chin
United States District Judge